

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KIMBERLY DOUGLASS	:	VIOLATIONS:
	:	18 U.S.C. § 924(a)(1)(A)
	:	(making false statements to a firearms
	:	dealer - 2 counts)
	:	Notice of forfeiture
		Notice of additional factors

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 27, 2004, at Schnecksville, in the Eastern District of Pennsylvania, defendant

KIMBERLY DOUGLASS,

in connection with the acquisition of the firearms listed in the chart below, from the Eagle Arms Sport Shop, 9331 Hamilton Boulevard, Route 222, Breinigsville, Pennsylvania, a dealer licensed under the provisions of Chapter 44 of Title 18, United States Code ("Chapter 44") to engage in the business of dealing in firearms, knowingly made a false and fictitious statement with respect to information required by the provisions of Chapter 44 to be kept in the records of Eagle Arms Sport Shop, in that defendant KIMBERLY DOUGLASS certified on ATF Form 4473, Firearms Transaction Record, that: (1) she was the actual buyer of the firearms; and (2) her residence was 1704 Sweetbriar Road, Morrisville, Pennsylvania, when, as defendant well knew, these

statements and representations were false and fictitious.

Make	Model	Caliber	Serial No.
HIPOINT	CF380	.380ACP	P812550
HIPOINT	CF380	.380ACP	P812553
HIPOINT	CF380	.380ACP	P812554
HIPOINT	CF380	.380ACP	P812555
HIPOINT	CF380	.380ACP	P812558

In violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 28, 2004, at Schnecksville, in the Eastern District of Pennsylvania, defendant

KIMBERLY DOUGLASS,

in connection with the acquisition of the firearms listed in the chart below, from the Eagle Arms Sport Shop, 9331 Hamilton Boulevard, Route 222, Breinigsville, Pennsylvania, a dealer licensed under the provisions of Chapter 44 of Title 18, United States Code ("Chapter 44") to engage in the business of dealing in firearms, knowingly made a false and fictitious statement with respect to information required by the provisions of Chapter 44 to be kept in the records of Eagle Arms Sport Shop, in that defendant KIMBERLY DOUGLASS certified on ATF Form 4473, Firearms Transaction Record, that: (1) she was the actual buyer of the firearms; and (2) her residence was 1704 Sweetbriar Road, Morrisville, Pennsylvania, when, as defendant well knew, these statements and representations were false and fictitious.

Make	Model	Caliber	Serial No.
HIPOINT	CF380	.380 ACP	P812552
STAR	BM	9 mm.	SBM00527
STAR	BM	9 mm.	SBM00708
STAR	BM	9 mm.	SBM00710
STAR	BM	9 mm.	SBM00711

In violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(a)(1)(A), set forth in Counts One and Two of this indictment, defendant

KIMBERLY DOUGLASS

shall forfeit to the United States of America, the firearms involved in the commission of these offenses, including, but not limited to:

1. a HIPOINT, Model CF380, .380ACP caliber pistol, serial number P812550;
2. a HIPOINT, Model CF380, .380ACP caliber pistol, serial number P812553;
3. a HIPOINT, Model CF380, .380ACP caliber pistol, serial number P812554;
4. a HIPOINT, Model CF380, .380ACP caliber pistol, serial number P812555;
5. a HIPOINT, Model CF380, .380ACP caliber pistol, serial number P812558;
6. a HIPOINT, Model CF380, .380 ACP caliber pistol, serial number P812552;
7. a STAR, Model BM, 9mm pistol, serial number SBM00527;
8. a STAR, Model BM, 9mm pistol, serial number SBM00708;
9. a STAR, Model BM, 9mm pistol, serial number SBM00710; and
10. a STAR, Model BM, 9mm pistol, serial number SBM00711.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One and Two of this indictment, defendant **KIMBERLY DOUGLASS**:

- a. Committed an offense involving 10 firearms, as described in U.S.S.G. § 2K2.1(b)(1).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney